

February 21 2014

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: CC Docket No. 95-116 and WC Docket No. 09-109.

Dear Ms. Dortch:

I am writing on behalf of Peerless Network, Inc. We noted the letter filed in the above dockets on February 7, 2014 by COMPTTEL, Cbeyond, Inc., HyperCube Telecom, LLC, and TDS Metrocom, LLC ("COMPTTEL Letter") that was sent to the North American Portability Management LLC on November 1, 2013. That letter expressed the concerns of COMPTTEL and the companies about the potential impact that the local number portability administrator selection may have on the companies and on COMPTTEL's other members.

As a member of COMPTTEL, Peerless Network would like to inform the Commission that it shares in concerns expressed by COMPTTEL and its other members. Peerless is troubled that the costs of multi-region vendor approach, particularly those that would be placed on smaller carriers have not been fully evaluated. Further, Peerless does not believe that the impact of a transition on smaller carriers has been adequately studied both in terms of cost and in terms of customer disruption. These concerns included that small and medium sized companies might not be able to withstand the costs that a regional portability approach under consideration might impose.

As noted in the COMPTTEL Letter, local number portability is the lifeblood of competitive local exchange carriers and an uninformed LNPA selection could have devastating consequences for smaller carriers. Peerless Network reiterates COMPTTEL's request that these concerns be entered into the Commission's record, and that they be properly considered and accounted for during the selection process.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Kell". The signature is fluid and cursive, with the first name "Scott" and last name "Kell" clearly distinguishable.

Scott Kell  
Executive Vice President, Operations and Engineering

cc: Julie Veach, Wireline Competition Bureau Chief  
The Honorable Betty Ann Kane, NANC Chair